

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
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Peter St. Laurent
Plaintiff

v.

UNITED PARCEL SERVICE, INC.
Defendant

Civil Action No. 04-11951-NG

**UNITED PARCEL SERVICE INC.'S STATEMENT IN
PREPARATION FOR SCHEDULING CONFERENCE**

Pursuant to Local Rule 16.1, the following is United Parcel Service Inc.'s ("UPS") statement in preparation for the Scheduling Conference in the above referenced case:

I. Proposed Discovery Plan

- a. Initial disclosures due by December 2, 2004;
- b. All motions to amend or supplement shall be filed by December 15, 2004;
- c. All fact discovery shall be completed by April 1, 2005;
- d. All expert witnesses on behalf of the plaintiff shall be designated in accordance with the Federal Rules of Civil Procedure and the Local Rules by May 2, 2005;
- e. All experts who may be witnesses on behalf of UPS shall be designated by June 15, 2005;
- f. All expert depositions shall be completed by August 1, 2005; and
- g. All dispositive motions shall be filed by September 1, 2005.

II. Certification

Please see attached certification on behalf of UPS.

United Parcel Service Inc.

By its attorneys



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